

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
BAY CITY DIVISION**

CAROLINE G. ZOCHER,

Plaintiff,

v.

FLEXSHOPPER, LLC d/b/a LIBERTY TAX  
& LOANS and JOHN DOES 1-10,

Defendants.

Case No. 1:24-cv-11025-JEL-PTM

Honorable Judge Judith E. Levy

**REQUEST FOR ENTRY OF CLERK’S DEFAULT**

**NOW COMES** Caroline G. Zocher (“Plaintiff”), and pursuant to Fed. R. Civ. P. 55(a), seeking the entry of a Clerk’s default against Flexshopper, LLC d/b/a Liberty Tax & Loans (“Libert Tax”) and John Does 1-10 (collectively “Defendants”), and in support thereof, stating as follows:

1. On April 18, 2024, Plaintiff filed the instant action against Defendant seeking redress for violations of the Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227 *et seq.* and the Michigan Occupational Code (“MOC”), M.C.L. §339.901. [Dkt. 1]

2. Plaintiff’s claims arise from Defendant’s abusive and unlawful debt collection practices.

3. On May 28, 2024, Defendant was served with Plaintiff’s complaint. [Dkt. 5]

4. Defendant’s responsive pleading was due on or before June 18, 2024.

5. Despite being duly served with Plaintiff’s complaint, Defendant has failed to appear or otherwise respond to Plaintiff’s complaint.

6. Pursuant to Fed. R. Civ. P. 55(a), Plaintiff is seeking the entry of a Clerk’s default as a result of Defendant’s failure to respond to Plaintiff’s complaint.

**WHEREFORE**, Plaintiff respectfully requests the entry of a Clerk's default against Defendant, and for any further relief the Court deems just and proper.

Dated: July 3, 2024

Respectfully submitted,

**CAROLINE G. ZOCHER**

By: /s/ Mohammed O. Badwan  
Mohammed O. Badwan, Esq.  
Sulaiman Law Group, Ltd  
2500 S. Highland Ave., Ste. 200  
Lombard, IL 60148  
Phone: (630) 575-8180  
mbadwan@sulaimanlaw.com  
*Counsel for Plaintiff*